

United States Courts
Southern District of Texas
FILED

April 06, 2022

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

CRIMINAL NO. 4:22-cr-167

**ARYION DUPREE JACKSON,
and
SAMARIA QUINSHAE KEARNEY,
Defendants.**

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Commit Sex Trafficking)

From on or about June 1, 2020, through July 19, 2020, in the Southern District of Texas
and elsewhere,

**ARYION DUPREE JACKSON,
and
SAMARIA QUINSHAE KEARNEY,**

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit or attempt to do so by any means, and benefited financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means, any persons knowing and in reckless disregard for the fact that means of force, fraud, and coercion would be used to cause these persons to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (a)(2), (b)(1).

COUNT TWO
(Sex Trafficking by Force, Fraud or Coercion)

From on or about June 2020, through July 19, 2020, in the Southern District of Texas and elsewhere,

ARYION DUPREEE JACKSON,
and
SAMARIA QUINSHAE KEARNEY,

defendants herein, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit or attempt to do so by any means a person, namely a female known as Adult Victim 1, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Adult Victim 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Adult Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), (b)(1) and 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

ARYION JACKSON,
and
SAMARIA KEARNEY,

that in the event of conviction of the offenses charged in Counts One and Two of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and all property traceable to such property; and
- (2) all real and personal property constituting or derived from proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

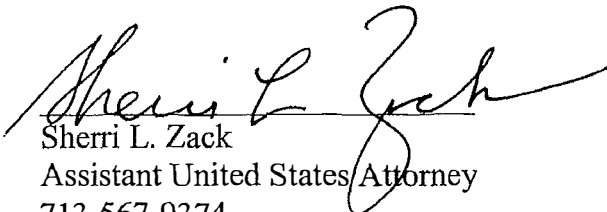
Money Judgment and Substitute Assets

In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

A True Bill:

JENNIFER LOWERY
United States Attorney

By:


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